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June 3, 2021

BY ECF

The Honorable Kevin McNulty
United States District Judge
District Court of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

***** ORDER *****

Re: USA v. Coburn et al., No. 19-cr-120-(KM)

Dear Judge McNulty:

This firm represents Cognizant Technology Solutions Corporation (“Cognizant”) in connection with Defendants Gordon J. Coburn’s and Steven Schwartz’s three Subpoenas to Produce Documents, Information, or Objects in a Criminal Case served on Cognizant in the above-referenced matter (the “Subpoenas”). We write to respectfully request another one-week extension to file our Brief in Opposition to Defendants’ Motion to Compel and in Support of Cognizant’s Cross-Motion to Quash in connection with the first two Subpoenas, which concern Defendants’ “outsourcing” allegations” (the “First Subpoenas”).

Cognizant’s response to the pending motion to compel on the First Subpoenas is currently due on Tuesday, June 8, 2021. We respectfully request a one-week extension for Cognizant to file its response on or before Tuesday, June 15, 2021. The additional time will allow us to adequately respond to the number of factual and legal issues presented in the motion. If granted, Defendants deadline to reply and oppose Cognizant’s cross-motion would also be extended by one week, from July 9, 2021, to July 16, 2021; and Cognizant’s deadline to reply with respect to its cross-motion would be extended from July 19, 2021, to July 26, 2021. Defendants consent to this request. Cognizant does not anticipate making any further requests for extensions with respect to the briefing schedule for the First Subpoenas.

Thank you for your attention to this matter. For the Court’s convenience, if this request meets with your approval, I have included a “So Ordered” signature line below. If Your Honor wishes to discuss these matters, we are available for a telephone conference at the Court’s convenience.

Respectfully submitted,

s/ Ricardo Solano Jr.

Ricardo Solano Jr.

cc: All Counsel via ECF

SO ORDERED:

DATED: June 4, 2021

/s/ Kevin McNulty

Hon. Kevin McNulty, U.S.D.J.